

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, <i>et al.</i>, Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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APACHE CORPORATION'S EMERGENCY MOTION FOR A STATUS CONFERENCE

Emergency relief has been requested. A hearing will be conducted on this matter on Tuesday, August 3, 2021 at 2:30 pm prevailing Central Time.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. You will be responsible for your own long distance charges. Once connected, you will be asked to enter the conference room number. Judge Isgur's conference room number is 954554.

You may view video via GoToMeeting. To use GoToMeeting, the Court recommends that you download the free GoToMeeting application. To connect, you should enter the meeting code "JudgeIsgur" in the GoToMeeting app or click the link on Judge Isgur's home page on the Southern District of Texas website. Once connected, click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of the hearing. To make your electronic appearance, go to the Southern District of Texas website and select "Bankruptcy Court" from the top menu. Select "Judges' Procedures," then "View Home Page" for Judge Isgur. Under "Electronic Appearance" select "Click here to submit Electronic Appearance". Select the case name, complete the required fields and click "Submit" to complete your appearance.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must either appear at the hearing or file a written response prior to the hearing. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

Relief is requested not later than Friday, July 30, 2021.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

Apache Corporation (“Apache”) files this emergency motion (the “Motion”) seeking entry of an order, substantially in the form attached hereto, setting a status conference regarding the Court’s *Findings of Fact, Conclusions of Law, and Order (I) Confirming Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors and (II) Granting Related Relief* (the “Confirmation Order”) [Docket No. 1751]; specifically as it pertains to the finalization of the Apache-Surety Definitive Documents² approved thereunder. In support of this Motion, Apache respectfully states as follows:

RELIEF REQUESTED

1. Apache respectfully requests entry of an order setting a scheduling conference to report to the Court on the status of the Apache-Surety Definitive Documents, and, if necessary, resolve any remaining open issues between Apache, the Debtors, and the Apache Sureties (collectively, the “Parties”) that pertain to finalizing the Apache-Surety Definitive Documents in advance of the Plan’s Effective Date.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction to consider this Application under 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are section 105(d)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Confirmation Order.

the Procedures for Complex Chapter 11 Cases in the Southern District of Texas (the “Complex Case Procedures”).

BASIS FOR RELIEF REQUESTED

4. Section 105(d)(1) of the Bankruptcy Code provides that the Court “shall hold such status conferences as are necessary to further the expeditious and economical resolution of the case.”

5. At present, the Debtors anticipate that the Plan’s Effective Date will occur sometime during the week of August 2, 2021, and the Parties are working diligently towards finalizing the Apache-Surety Definitive Documents in advance of the Effective Date. Since open items pertaining to the Apache-Surety Definitive Documents may remain unresolved among the Parties and present an impasse to the Plan’s Effective Date timely occurring, Apache requests the Court set a status conference so that the Court can, if necessary, facilitate resolution among the Parties (in accordance with the Court’s authority to resolve any such disputes, as reflected in the Apache-Surety Term Sheet annexed to the Confirmation Order as Exhibit B). Apache submits that setting a status conference with the Court would be beneficial to all Parties in reaching a consensus regarding the final forms of the Apache-Surety Definitive Documents – the finalization of which will aid in the timely occurrence of the Plan’s Effective Date. Accordingly, Apache submits good cause exists to set a status conference prior to the Effective Date.

EMERGENCY CONSIDERATION

6. In accordance with Bankruptcy Local Rule 9013-1, Apache respectfully requests emergency consideration of this Motion. This Motion requests relief intended to aid the Debtors in timely reaching the Effective Date, which is ultimately for the benefit of the Debtors, their estates, and all parties in interest. Accordingly, Apache respectfully requests that the Court approve the relief requested in this Motion on an emergency basis.

CONCLUSION

7. For the reasons set forth herein, Apache respectfully requests that the Court grant the relief requested herein and such other and further relief as it deems just and proper.

Dated: July 28, 2021

Respectfully submitted,

/s/ Robin Russell

Robin Russell (Texas Bar No. 17424001)

Catherine A. Diktaban (Texas Bar No. 24109810)

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Counsel for Apache Corporation

CERTIFICATE OF CONFERENCE

The undersigned counsel conferred with counsel to the Apache Sureties and the Debtors on July 27, 2021 by e-mail regarding the relief requested herein.

/s/ Robin Russell

Robin Russell

CERTIFICATE OF SERVICE

I certify that on July 28, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas on those parties registered to receive electronic notices.

/s/ Robin Russell

Robin Russell